

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

ST. CLAIR COUNTY EMPLOYEES')
RETIREMENT SYSTEM, Individually and)
on Behalf of All Others Similarly Situated,)
) Civil Action No. 3:18-cv-00988
 Plaintiff,)
) CLASS ACTION
vs.)
)
ACADIA HEALTHCARE COMPANY,)
INC., JOEY A. JACOBS, BRENT)
TURNER and DAVID DUCKWORTH,)
)
 Defendants.)
)
)
)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Plaintiff St. Clair County Employees' Retirement System ("Plaintiff") filed a putative Class Action Complaint ("Complaint") on October 1, 2018, alleging violations of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, counsel for Defendants Acadia Healthcare Company, Inc., Joey A. Jacobs, Brent Turner and David Duckworth (collectively, "Defendants") waived service of the summons and Complaint on October 22, 2018;

WHEREAS, the Private Securities Litigation Reform Act ("PSLRA"), 15 U.S.C. § 78u-4(a)(3)(A)-(B), provides that (i) not later than 20 days after the date on which the first complaint in a private securities class action is filed, the plaintiff shall publish a notice advising members of the purported plaintiff class, (ii) not later than 60 days after the date on which the notice is published any member of the purported class may move the court to serve as lead plaintiff, and (iii) not later than 90 days after the date on which notice is published the Court shall appoint the "most adequate plaintiff" as lead plaintiff for the class ("Lead Plaintiff");

WHEREAS, it is customary in securities class action cases under the PSLRA for the appointed Lead Plaintiff to file a consolidated complaint (“Consolidated Complaint”);

WHEREAS, the Court set the initial case management conference at 10:30 a.m. on December 4, 2018 (Dkt. No. 3);

WHEREAS, the PSLRA, 15 U.S.C. § 78u-4(b)(3)(B), provides all discovery, including initial disclosures pursuant to Fed. R. Civ. P. 26(a), shall be stayed during the pendency of the motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party;

WHEREAS, Plaintiff and Defendants (collectively, the “Parties”) have met and conferred, and for the convenience of all Parties and the Court, hereby enter into the following stipulation regarding the briefing schedule and initial case management conference in this matter;

NOW, THEREFORE, the Parties, through their undersigned attorneys and subject to the Court’s approval, stipulate and agree to the following:

1. Defendants need not respond to the Complaint, filed October 1, 2018;
2. Within 60 days of the Court’s appointment of a Lead Plaintiff in this action, Lead Plaintiff will file a Consolidated Complaint;
3. Defendants’ response to the Consolidated Complaint will be due 60 days after Lead Plaintiff files its Consolidated Complaint;
4. If Defendants move to dismiss the Consolidated Complaint, Lead Plaintiff’s opposition to Defendants’ motion to dismiss will be due 60 days after Defendants file their motion(s) to dismiss;
5. If Defendants move to dismiss, Defendants’ reply to Lead Plaintiff’s opposition will be due 30 days after Lead Plaintiff files its opposition; and

6. The initial case management conference currently set at 10:30 a.m. on December 4, 2018 is continued subject to be rescheduled, if necessary, after the Court's ruling on Defendants' anticipated motion to dismiss the Consolidated Complaint.

Stipulated and agreed this 1st day of November, 2018.

SO ORDERED this _____ day of _____, 2018.

Hon. Eli J. Richardson
United States District Judge

SUBMITTED FOR ENTRY:

s/ Christopher M. Wood
Jerry E. Martin (BPR #20193)
Christopher M. Wood (BPR #254908)
Robbins Geller Rudman & Dowd LLP
414 Union Street, Suite 900
Nashville TN 37219
Telephone: (615) 244-2203
Facsimile: (615) 252-3798
jmartin@rgrdlaw.com
cwood@rgrdlaw.com

David C. Walton
Danielle S. Myers
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: (619) 231-1058
Facsimile: (619) 231-7423
davew@rgrdlaw.com
danim@rgrdlaw.com

Thomas C. Michaud
Vanoverbeke, Michaud & Timmony, P.C.
79 Alfred Street
Detroit, MI 48201
Telephone: (313) 578-1200
Facsimile: (313) 578-1201
tmichaud@vmtlaw.com

Attorneys for Plaintiff

s/ Steven A. Riley

Steven A. Riley
Milton S. McGee, III
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, TN 37203
Telephone: (615) 320-3700
Facsimile: (615) 320-3737
sriley@rwjplc.com
tmcgee@rwjplc.com

Jessica Perry Corley
Derek S. Hammond
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: (404) 572-4717
jpcorley@kslaw.com
dhammond@kslaw.com

Lisa Bugni
King & Spalding LLP
101 Second Street, Suite 2300
San Francisco, CA 94105
Telephone: (415) 318-1234
lbugni@kslaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via the Court's ECF filing system upon:

Jerry E. Martin
Christopher M. Wood
Robbins Geller Rudman & Dowd LLP
414 Union Street, Suite 900
Nashville, TN 37219

David C. Walton
Danielle S. Myers
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498

Thomas C. Michaud
Vanoverbeke, Michaud & Timmony, P.C.
79 Alfred Street
Detroit, MI 48201

This the 1st day of November, 2018.

s/ Steven A. Riley